

Law Offices

**MORGAN, LEWIS & BOCKIUS LLP**

Melissa D. Hill

[melissa.hill@morganlewis.com](mailto:melissa.hill@morganlewis.com)

101 Park Avenue

New York, New York 10178

(212) 309-6318 (Telephone)

(212) 309-6001 (Fax)

Sarah E. Bouchard (*Pro Hac Vice*)

1701 Market Street

Philadelphia, PA 19103

(215) 963-5077 (Telephone)

(215) 963-5001 (Fax)

[sbouchard@morganlewis.com](mailto:sbouchard@morganlewis.com)

Attorneys for Defendants

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

MARAT GOKHBERG, YURY GOKHBERG,  
DAVID JAFFE, SUREKHA BASSI, and MARC  
FRANCHI,

Plaintiffs,

v.

THE PNC FINANCIAL SERVICES GROUP, INC.  
and PNC BANK, N.A.,

Defendants.

**Case No.: 1:15-cv-06001-LTS**

**Document Filed Electronically**

**DEFENDANTS' NOTICE OF MOTION  
AND MOTION TO TRANSFER VENUE PURSUANT TO  
28 U.S.C. § 1404(a) TO THE WESTERN DISTRICT OF PENNSYLVANIA**

PLEASE TAKE NOTICE that, pursuant to 28 U.S.C. § 1404(a), and upon the instant Motion, the accompanying Memorandum of Law and supporting declarations and exhibits, as well as all prior papers, pleadings and proceedings in this case, Defendants The PNC Financial Services Group, Inc. and PNC Bank, National Association (collectively, "PNC" or "Defendants"), by and

through their undersigned counsel, will move before The Honorable Laura T. Swain, United States District Court Judge, on a date and at a time to be designated by the Court, at the United States District Courthouse for the Southern District of New York, 500 Pearl Street, New York, New York 10007, for an Order transferring this case to the United States District Court for the Western District of Pennsylvania.

Defendants' counsel hereby certifies that that they have complied with the requirements of Individual Practice A.2.b.i, and have used their best efforts to informally resolve the matter in controversy. Specifically, counsel for Defendants conducted a telephone call with Plaintiffs' counsel on September 2, 2015 and discussed the grounds for Defendants' motion to transfer, and counsel for Defendants sent a letter dated September 9, 2015 to Plaintiffs' counsel outlining Defendants' legal and factual position regarding the motion to transfer. Plaintiffs' counsel sent counsel for Defendants a letter dated September 11, 2015 setting forth Plaintiffs' legal and factual position regarding the motion to transfer and indicating that Plaintiffs intend to oppose the motion.

Dated: September 11, 2015

Respectfully submitted,

MORGAN, LEWIS & BOCKIUS LLP

/s/ Sarah E. Bouchard

Sarah E. Bouchard (*Pro Hac Vice*)

1701 Market Street

Philadelphia, PA 19103

215-963-5077

215-963-5001 (fax)

[sbouchard@morganlewis.com](mailto:sbouchard@morganlewis.com)

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212.309.6318

212.309.6001 (fax)

[melissa.hill@morganlewis.com](mailto:melissa.hill@morganlewis.com)

*Attorneys for Defendants*

**CERTIFICATE OF SERVICE**

I hereby certify that copies of (1) Defendants' Notice of Motion and Motion to Transfer Venue Pursuant to 28 U.S.C. § 1404(a) to the Western District of Pennsylvania, (2) Defendants' Memorandum of Law in Support of Defendants' Motion to Transfer Venue Pursuant to 28 U.S.C. § 1404(a) to the Western District of Pennsylvania, and (3) the Declaration of Sarah E. Bouchard and supporting exhibits, were electronically filed with the Court and served via its ECF/CM system on September 11, 2015 upon the following:

Hope Allison Pordy  
SPIVAK, LIPTON, WATANABE, SPIVAK & MOSS LLP  
1700 Broadway, Suite 2100  
New York, NY 10019  
[hpordy@spivaklipton.com](mailto:hpordy@spivaklipton.com)

*Attorneys for Plaintiffs*

s/ Sarah E. Bouchard  
Sarah E. Bouchard